



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

December 18, 2007

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BY FAX

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Wanda Vasquez  
07 Cr. 352 (PAC)

Dear Judge Crotty:

I write to request a four week adjournment of the plea currently scheduled for December 20, 2007, and also to request the exclusion of time until a control date of January 31, 2008. As the Court knows, the parties are in the final stages of completing a plea agreement. After a meeting on December 12, 2007 with the defendant and his counsel, I expect that my office will be in a position to approve a final agreement shortly, but not before the December 20, 2007 date. Therefore, the parties jointly request an adjournment until January.

The Government also requests that the Court exclude time until January 31, 2008. The Government submits that such exclusion is warranted pursuant to 18 U.S.C. § 8161(h)(8)(A). Specifically, the ends of justice outweigh the best interest of the public and the defendant in a speedy trial because it affords the defendant and the Government to continue and complete their ongoing discussions concerning the facts of the case and a potential disposition in the case. Those activities are necessary to ensure the effective assistance of counsel.

Mark Cohen, counsel for the defendant, told me by

MEMO ENDORSED

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telephone yesterday that he consents to the adjournment of the  
conference and the exclusion of time.

Very truly yours,

MICHAEL J. GARCIA  
United States Attorney

By: William J. Harrington  
William J. Harrington  
Assistant United States Attorney  
212-637-2331

cc: Mark Cohen  
Counsel for the defendant  
(By fax: 212 293 7224)

**Application GRANTED.** The conference is adjourned to  
2/15/08 at 3:45 PM in Courtroom 20C. It is  
further that pursuant to 18 U.S.C. 3161 (b) (8) (A), the time from  
12/20/07 until 2/15/08 is excluded in the interest of  
justice. I find that this exclusion outweighs the best interest of the  
defendant and the public is a speedy trial. So Ordered.

**SO ORDERED:** 12-19-07  
Paula A. Crotty  
HON. PAULA A. CROTTY  
UNITED STATES DISTRICT JUDGE